

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

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In Re:) Case No. 19-30088
) Chapter 11
PG&E CORPORATION AND PACIFIC)
GAS AND ELECTRIC COMPANY,) San Francisco, California
) Tuesday, June 7, 2022
Reorganized Debtors.) 10:00 AM
)
REORGANIZED DEBTORS'
FIFTEENTH SECURITIES CLAIMS
OMNIBUS OBJECTION (SECURITIES
ACQUIRED OUTSIDE SUBJECT
PERIOD) FILED BY PG&E
CORPORATION [11343]

PRE-TRIAL CONFERENCE RE
OBJECTIONS TO CLAIMS OF TODD
GREENBERG, FORTIETH OMNIBUS
OBJECTION TO CLAIMS (DKT NO.
9455), AND ONE HUNDRED TENTH
OMNIBUS OBJECTION TO CLAIM
(DKT NO. 11420)

MOTION OF WILLIAM B. ABRAMS
PURSUANT TO FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2004 FOR
ENTRY OF AN ORDER AUTHORIZING
DISCOVERY AND HEARINGS
REGARDING THE ADMINISTRATION
OF THE FIRE VICTIM TRUST
FILED BY WILLIAM ABRAMS
[12440]

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE DENNIS MONTALI
UNITED STATES BANKRUPTCY JUDGE

APPEARANCES (All present by video or telephone):
For the Reorganized Debtors: DAVID HILL, ESQ.
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5 THOMAS B. RUPP, ESQ.
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9 For Todd Greenberg: RICHARD A. LAPPING, ESQ.
10 Trodella & Lapping LLP
11 540 Pacific Avenue
San Francisco, CA 94133
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12 For John Trotter (Ret.) DAVID J. MOLTON, ESQ.
13 for Fire Victim Trust: Brown Rudnick LLP
14 Seven Times Square
New York, NY 10036
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15 Also Present: William B. Abrams
16 Movant and Individual Claimant
17 Richard Lane
Individual Claimant

18 Court Recorder: LORENA PARADA
19 United States Bankruptcy Court
20 450 Golden Gate Avenue
San Francisco, CA 94102

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25 Proceedings recorded by electronic sound recording;
transcript provided by transcription service.

PG&E Corporation and Pacific Gas and Electric Company
SAN FRANCISCO, CALIFORNIA, TUESDAY, JUNE 7, 2022, 10:00 AM

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(Call to order of the Court.)

THE CLERK: Calling the matter of PG&E Corporation.
And I will bring in Mr. Hill now.

MR. HILL: Good morning, Your Honor.

THE COURT: Mr. Hill, you're appearing for whom?

MR. HILL: Good morning, Your Honor. David Hill,
Weil, Gotshal & Manges, on behalf of the reorganized debtors.

THE COURT: Okay. So Mr. Hill, do we -

Ms. Parada, has Mr. Oliveros or Ms. Oliveros shown up
in the courtroom?

THE CLERK: I do not see Mr. or Mrs. Oliveros in the
attend --

THE COURT: All right.

THE CLERK: -- waiting room.

THE COURT: Mr. or Mrs. Oliveros, this is the time
we've set for hearing on the objection to your claim that Mr.
Hill is prosecuting for the company. If you wish to be heard,
and you want to make comments to the Court, you need to raise
your hand on the screen, and we'll bring you into the virtual
courtroom.

Mr. Hill, while we're waiting to see if they're there,
have you heard recently from Mr. or Mrs. Oliveros?

MR. HILL: Your Honor, we haven't; though we did send

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1 last Thursday by mail and overnight FedEx hearing instructions
2 on how to dial in to this hearing, as well as the notice and a
3 copy of -- our courtesy copy as well as our reply. According
4 to the FedEx tracking information, it was delivered on
5 Saturday. We have not heard from them.

6 THE COURT: Ms. Parada, I don't see - oh, I do see a
7 hand up for Mr. Serepian (phonetic), but I believe he's
8 appearing on Mr. Abrams' matter.

9 THE CLERK: That's correct, Your Honor.

10 THE COURT: So Mr. Serepian, please put your hand down
11 unless you expect to be heard on the Oliveros matter. We'll
12 call you in a moment.

13 Okay. Mr. Hill, I've reviewed the papers, and you've
14 made a persuasive argument that Mr. and Mrs. Oliveros simply
15 don't have a basis for asserting a claim based upon the
16 category of claimants who have allegedly been defrauded during
17 the approximately three years prior to the bankruptcy. And
18 their claim, as you've established, is an equity interest that
19 goes back decades, and they have not shown any indications to
20 the contrary. So I'm prepared to sustain the debtors'
21 objection and disallow. Actually, it's disallowing the claim,
22 because it's based upon a proof of interest and not an
23 actionable claim. Is that consistent with your understanding?

24 MR. HILL: Yes, Your Honor. I don't think I'll object
25 to your sustaining or expunging.

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1 THE COURT: Okay. Then go ahead and please serve Mr.
2 and Mrs. Oliveros with a form of the order that sustains the
3 objection and disallows it as a claim.

4 MR. HILL: We will do so, Your Honor. Thank you.

5 THE COURT: Okay. Thank you very much.

6 We're now going to take the Greenberg matter. And
7 then for those of you waiting in the court, we'll conclude with
8 Mr. Abrams' matter, but not until we deal with another matter
9 first.

10 Ms. Dodge, would you check in, and turn on your camera
11 and your mic, and make your appearance?

12 And Mr. Rupp.

13 MR. RUPP: Good morning, Your Honor. Thomas Rupp of
14 Keller Benvenuti Kim for the reorganized debtors.

15 MS. DODGE: Good morning, Your Honor. Jennifer Dodge
16 on behalf of the reorganized debtors.

17 THE COURT: Well, I was going to ask you if you knew
18 where Mr. Lapping was, but now I see him.

19 MR. LAPPING: Good morning, Your Honor. Richard
20 Lapping on behalf of Todd Greenberg.

21 THE COURT: So we had set this pre-trial, essentially,
22 some time ago, and things have happened; obviously, as you
23 know, a lot. So if you simply assure me that your clients will
24 be prepped by each of you respectively before our trial at the
25 end of the month, so they'll know how to check in on video and

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1 check the connections and the sound. And unless there's
2 anything else, I don't need to deal with anything today.

3 Do either of you have anything we need to touch base
4 on?

5 MR. LAPPING: Yes.

6 THE COURT: Okay.

7 MR. LAPPING: Yes, Your Honor. And I will observe
8 that I did read your order very carefully, and so my client,
9 when he's testifying, will be downstairs in a conference room
10 by himself with no papers. And I think that's the rule, and
11 that works fine for us.

12 THE COURT: No. No. Hold on. He can have papers
13 that are exhibits. I mean, if he needs to refer to something,
14 if you're questioning him about something that's been marked
15 for exhibit, there's certainly no reason why he can't have
16 that.

17 MR. LAPPING: Okay. All right. Well, thank you, Your
18 Honor. Thanks for the clarification. It's my first time doing
19 one of these Zoom trials.

20 And also I talked to Ms. Dodge earlier this morning,
21 and I've had some stuff come up. And our pre-trial submissions
22 are supposed to be on Monday, June 13th, and she has agreed
23 with my proposal to have them due on Thursday, June 16th.
24 That's still more than a week before the trial.

25 THE COURT: Okay. No problem.

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1 MR. LAPPING: Okay.

2 THE COURT: No problem. I mean, I'll read them before
3 the trial. I promise.

4 THE COURT: Okay.

5 MS. DODGE: I have a couple. Just two matters, Your
6 Honor. One is that I'm not aware that Mr. Lapping has filed
7 the amended claims yet that were supposed to be filed pursuant
8 to the stipulation and order that was entered.

9 THE COURT: You'll have to refresh me on that. Mr.
10 Lapping, did you?

11 MR. LAPPING: Your Honor, yeah. I'm just behind on a
12 number of things, and so I will get them officially filed. One
13 was granted and goes in, and the other one was done by
14 stipulation. And Mr. Rupp sent me a nice detailed set of
15 instructions on how to do it, but I just haven't gotten it done
16 yet. But I will do that this week.

17 THE COURT: Okay. But unless something else happens,
18 when we go to trial on I think it's the 27th, right?

19 MR. LAPPING: Yes, Your Honor.

20 MS. DODGE: Correct.

21 THE COURT: It's a one-day trial, and it's only on Mr.
22 Greenberg's claim based upon the loss of power to his
23 refrigerator and all the things that followed from that, right?

24 MR. LAPPING: Correct.

25 THE COURT: And I have to make my usual plea to see if

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1 there's any interest in trying to get this case settled before
2 it goes to trial, but I'm sure you've considered that, and
3 maybe your clients will consider it again as June 27th looms.

4 Mr. Rupp, do you have anything to add?

5 MR. RUPP: No, Your Honor.

6 THE COURT: Okay. Well, if you're able to settle, I
7 won't miss you on the 27th. If you don't settle, I will look
8 forward to seeing you both and your clients, and we'll have the
9 trial.

10 UNIDENTIFIED SPEAKER: Great. Thank you very much,
11 Your Honor.

12 MS. DODGE: All right. Thank you, Your Honor.

13 THE COURT: Thank you. Now, Ms. Parado, for the
14 matter involving Mr. Abrams, please bring Mr. Abrams into the
15 room and whoever has indicated as the counsel who's going to
16 appear for the trustee, and then I'm going to make up a brief
17 statement, and then we'll deal with other people who may want
18 to come in. I see Mr. Molton has his hand up.

19 All right. For the claimants, fire victims, and
20 others who have been following this, some people have filed,
21 essentially, a joinder to the request that Mr. Abrams filed,
22 and I'm not ignoring those requests. We put a couple of them
23 on the docket as requested. May not have gotten to all of
24 them. But I want to make sure all of you understand. I'm sure
25 Mr. Molton understands, and I hope Mr. Abrams understands.

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1 Mr. Abrams filed his papers on May 23rd, and he took
2 it upon himself when he filed those papers to set a possible
3 hearing on June 27th and response deadlines and what have you.
4 But I preempted him -- not to take away his rights to be heard
5 but to address the question of how I'm going to manage this
6 case. And that's why, on May 23rd, I also issued the order
7 setting the preliminary hearing, and that is the hearing we're
8 having today. And I specifically asked that the Fire Victim
9 trustee not file anything before the hearing, because I wanted
10 to -- because of the, sort of, the sweeping nature of Mr.
11 Abrams' request, I didn't want to have a volume of papers to
12 have to deal with on an expedited basis. I was more
13 comfortable with giving the fire trustee and whatever counsel
14 who chose to come forth to speak for the trustee to give me a
15 heads up as to how the trustee, their client, wishes to proceed
16 with what Mr. Abrams has asked for.

17 And so for the benefit of everyone in the audience who
18 wanted to be heard today, I don't mean to be rude. I may allow
19 brief appearances. But there's nothing for me to decide today.
20 And for you to argue -- those of you that support Mr. Abrams
21 and believe that the fire trustee should be called upon to
22 produce information or provide documents or do whatever, that
23 those are noted, but I'm simply not going to act on them. I'm
24 not going to grant them or deny them.

25 So that's just a brief statement. Again, it's not

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1 that I don't care about your interests. It's that I care about
2 the process. And I mean no criticism of Mr. Abrams for the
3 manner in which he set forth his position. He did it quite
4 admirably. But I need to have the fire trustee be heard on the
5 procedure first.

6 So with that, Mr. Molton, if you would state your name
7 for the record, which I know anyway, and then, in response to
8 my order, tell me how you intend to proceed in response to Mr.
9 Abrams' requests.

10 MR. MOLTON: Thank you, Judge. Your Honor, can you
11 hear me? That's the first question I ask on all these Zoom.

12 THE COURT: Yes, I can.

13 MR. MOLTON: Thanks.

14 THE COURT: Can you hear me?

15 MR. MOLTON: Loud and clear, Your Honor. David Molton
16 of Brown Rudnick, as you know, Your Honor, for the Fire Victim
17 Trust and the Honorable John Trotter, retired in his capacity
18 as Fire Victim trustee.

19 Your Honor, I would agree with you that Mr. Abrams'
20 package was expansive, clearly. And I read Your Honor's order
21 and Your Honor's directive this morning that Your Honor does
22 not want us getting into merits or discussion of merits today.
23 So put it this way. Over the past week, Your Honor, the Fire
24 Victim Trust held a number of meet and confers -- three meet
25 and confers, I believe -- Mr. Abrams will tell me if I'm

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1 wrong -- with Mr. Abrams in an attempt to seek if we can avoid
2 having Your Honor deal with this issue and receive a package of
3 papers and hear argument.

4 Our view on this, as usual, Your Honor, and of course
5 is going to be informed by our constitutional documents, which
6 is the plan, the confirmation order, and the trust agreement
7 that was approved by Your Honor two years ago almost.

8 In any event, Your Honor, to the extent, and because
9 we're not able to resolve this, my suggestion, Judge, is that
10 we have two weeks to put in a response. That would be the
11 21st. Needless to say, Mr. Abrams should have time to reply,
12 if Your Honor so consents. And then we put this on for hearing
13 some time, I would say, Judge, after the 4th of July holiday.

14 It's our hope, Your Honor -- we have forward-looking
15 disclosures that go out on a daily basis on our website and
16 intermittently on the website and otherwise (sic). And I just
17 urge Mr. Abrams and everybody else interested to watch and pay
18 attention and see if their issues aren't necessarily answered
19 or in some way ameliorated.

20 THE COURT: Wait. Just expand on that. I mean, I
21 don't monitor the trustee's website. What is it that he or
22 others might be seeing posted?

23 MR. MOLTON: Judge, we have -- at firevictimtrust.com
24 I think it is -- we have a website that we provide to the
25 public. It's forward facing and public facing, and in it every

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1 month we give updates as to the claims administration, and
2 claims administration, as Your Honor knows, is what this trust
3 is about; what it should be about, and what it is about. And
4 we give updated information as to the amount of determination
5 notices that are given, as to the total amount of value in
6 those determination notices, the total preliminary and pro rate
7 of payments, et cetera, et cetera, et cetera.

8 We also intermittently post on that website -- and I
9 would urge everybody who's listening -- in connection with the
10 annual report that was filed in late April, Your Honor, we did
11 post a notice to fire victims that explains a little bit about
12 that annual report, and that is on our website, as well as
13 giving fire victims information as to whatever monetization of
14 the illiquid assets that were given as consideration to the
15 Fire Victim Trust that have occurred, as well as, Your Honor,
16 other information such as what the pro rata payment percentage
17 is. And this year it was increased, Your Honor, from thirty to
18 forty-five percent.

19 I do want to say, Judge, we are really proud that at
20 the present time we have a number of determinations of 29,000,
21 almost 30,000, claims determined, and the number of claimants
22 associated with those claims is about 43,000 -- that's about
23 sixty-six percent of our pool -- for a total amount of
24 determination in the range of 9.53 billion dollars. Of course,
25 Your Honor, how that gets paid is dependent on the payment

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1 percentage.

2 THE COURT: Let me interrupt you, though. Those are
3 helpful, but they aren't the things that Mr. Abrams focused on.
4 If you zero in on his papers, and one page of paper from the
5 trustee, page 22 of 25 in document 12287, it's the seven lines
6 of supplementary schedules of operating expenses. And I think
7 Mr. Abrams has asked for details on that. And of course, he's
8 asked for information about the state of the lobbying efforts.
9 And that's, of course, not an accounting issue.

10 And so you've got to -- again, I'm not asking you to
11 roll over if you think he's off base, but it certainly has to
12 be on your to-do list in terms of your response. I don't need
13 a response in two weeks that tells me the kind of stuff you
14 just told me, because that's already there public. But I have
15 to say, Mr. Abrams makes a point that there's substantial
16 numbers in those seven lines, and there's not a whole lot of
17 detail.

18 MR. MOLTON: Judge, you know, again, Your Honor, our
19 view is informed by the trust documents. We'll deal with that.
20 I do want to say that some of the information that Mr. Abrams
21 seeks as to what the trust is doing on those other issues is
22 the subject of public disclosure. And needless to say, there
23 may be further status reports that go into that.

24 I do want to say, Your Honor, that we have, as Your
25 Honor knows, a trust advisory committee that is responsible for

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1 the administration of the estate or oversight of the
2 administration of the estate, that has the ability to meet and
3 confer with the trustee, that has consent rights over budget.
4 And to a large extent, what Mr. Abrams is looking for, Your
5 Honor, has to do with those issues of trust administration.

6 The trust agreement, Your Honor, Section 2.2(g)
7 basically provides our operating mandate, which is the trustee
8 shall provide information on the trust website as he deems
9 prudent in his or her sole discretion. The trustee has no
10 obligation to provide, and beneficial owners have no right to
11 receive, information regarding the operation of the trust
12 except as provided in Section 2.2(c) above.

13 And as Your Honor knows, Section 2.2(c) requires us to
14 file the annual report. We filed that. It contains a special
15 purpose statement submitted by independent auditing firm BDO
16 that contains an opinion as to fairness in all material
17 respects of the special purpose financial statement.

18 We believe, Your Honor, that to the extent that Mr.
19 Abrams is seeking really justification, explanation of strategy
20 and tactics and the trust's activities in that regard, it's
21 beyond the scope of the trust agreements.

22 We do have, as I mentioned, Your Honor, a TOC, which
23 under 6.1 of our trust agreement represents the interests of
24 all holders of their fire victim claims in the administration
25 of the trust. Section 6.2 invites upon them a fiduciary duty

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1 in representing those interests in the administration of the
2 trust. Again, there's all sorts of confer and consent rights
3 that they have in connection therewith, and much of what Mr.
4 Abrams deals with really revolves around that.

5 I do know, Judge, Mr. Abrams is no stranger to this
6 Court. He's no stranger to the trust. We deal with him. I've
7 dealt with Mr. Abrams with an open line on a monthly basis
8 almost since you first saw me, Your Honor. And I know he's
9 been in front of Your Honor at least twenty-seven times on
10 objections or motions. I do want to know --

11 THE COURT: Who's counting, right?

12 MR. MOLTON: Who's counting?

13 THE COURT: I haven't been counting.

14 MR. MOLTON: One of the things I do want to note,
15 because it's important in light of what Your Honor said and the
16 issue Your Honor raised. Since, Your Honor, the effective date
17 of the plan and the creation of the trust two years ago, this
18 is the fifth time Mr. Abrams was in front of you. The four
19 times before, Judge, had to do with his efforts to reconstitute
20 or replace the TOC.

21 THE COURT: But that's history.

22 MR. MOLTON: Yeah. But I'm saying, Judge, what we're
23 looking at here is an effort, having not necessarily been
24 successful in that, an effort on his part to actually place
25 himself almost as a TOC member in terms of supervision or

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1 oversight of the trust in his --

2 THE COURT: Mr. Molton, if this were a garden variety
3 simple Chapter 7, and a trustee was filing in an interim
4 report, would a creditor have the right to ask for more detail
5 on a line item that is in millions of dollars? Wouldn't a
6 creditor have a right to ask for a little more detail?

7 MR. MOLTON: Yes. I

8 THE COURT: Within reason. Within reason.

9 MR. MOLTON: Of course, Your Honor. But I don't think
10 that's what Mr. Abrams requests. Or if you actually look at
11 them, as I mentioned before, he's asking not only for those
12 line items, but he's going behind a justification, explanation.
13 And then he's asking for something that's -- from my
14 perspective, doing this, Your Honor, for a living as part of my
15 practice -- something remarkable, the actual posting of all of
16 the trust's contracts, which, again, is something that is
17 beyond what Your Honor said.

18 So we're looking forward to -- we're going to continue
19 to talk to Mr. Abrams, Your Honor. It may be that we'll be
20 able to, if Your Honor accepts the schedule I proposed,
21 perhaps, as Your Honor said, with respect to the last matter
22 that was in front of you, maybe we won't appear. My hope is
23 we'll be able to resolve this. But notwithstanding that,
24 Judge, Mr. Abrams is one of 70,000 claimants that we have to
25 deal with. And clearly the requests that he made are not

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1 limited to what you've indicated.

2 THE COURT: Okay. So again, Mr. Molton, to interrupt
3 you for a minute, and then I want to --

4 MR. MOLTON: Yes.

5 THE COURT: -- let Mr. Abrams speak. Your response
6 will flesh out why you think, as a matter of law, Mr. Abrams
7 shouldn't have as much as he seeks. And again, I'm asking you,
8 don't go back and say the same thing over that everybody knows
9 about it, and it isn't what he's complaining about.

10 MR. MOLTON: Right.

11 THE COURT: I don't think Mr. Abrams is asking for the
12 detail of any particular claimant or any particular
13 determination. What I glean is he, perhaps, broadly, painting
14 with a broad brush -- I'm using my metaphors here -- he's
15 asking for more information about these items, plus this
16 lobbying activity, which perhaps is a bit to the extraneous,
17 but it's still a question that he is asking.

18 So if you're telling me that you'll be in a position
19 to respond to the legal argument, in other words, why he
20 shouldn't be allowed to do this, I mean, I understand that
21 perhaps the notion of a very, very broad request for
22 production, as broad as you might ever see in any kind of
23 litigation, that's the kind of thing that people meet and
24 confer and narrow. And similarly turning the trustee loose in
25 a town hall meeting in front of any creditor who wants to ask

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1 him, I'm not sure I'm prepared for that either.

2 But that being said, I don't want to mislead you. I'm
3 not going to rule out, perhaps, the possibility that the
4 trustee is going to have to sit and be asked questions by Mr.
5 Abrams or otherwise. But I'll defer to that, and I'll wait and
6 see what kind of a response you file.

7 And again, having said that I didn't want you to
8 address the merits, I have to be faithful to my commitment here
9 and say you don't have to right now. And if you can do it all
10 in two weeks, that's fine. I'll come back to you in a minute.

11 Mr. Abrams, nice to see you again. I didn't count
12 your number of visits to the court. I haven't seen you in a
13 long time, so welcome back. Are you agreeable to what Mr.
14 Molton suggested, a procedure?

15 MR. ABRAMS: Thank you, Your Honor. Good to see you.
16 No, I'm not in agreement with Mr. Molton's revised dates or his
17 approach. And one of the things that leads me to that is that
18 these recent meetings were not the first that I've met with
19 trustee counsel. And I met with trustee counsel prior to
20 filing the motion, looking for them to willingly provide these
21 remedies and things like it and provide information to victims.
22 And at every turn, that information was not provided. So
23 that's what prompted that. So to put this off further, I
24 think, is a delay that we really can't afford. Given the
25 amount of information in the claims processing, the lobbying

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activities are still ongoing on those issues.

THE COURT: Well, Mr. Abrams, why don't you narrow the request then? In other words, you have such a broad request. I mean, you want this extremely broad. I don't even know how you, as one person, could possibly process it all. So why not narrow your request? If you want to know specifically about the lobbying, maybe Mr. Molton will accommodate you. Maybe he won't.

But the thing that I had trouble with -- not that you didn't. You did your homework. And like a good lawyer, you cited something that I've used. And you cited that what the trustee did to get information from the Adventist claimants. And then I compliment you on being focused on that. But your request is so broad, I don't know how anybody could make any kind of a meaningful response, or how you, frankly, could digest what a broad response would involve. And it's not probative of what seems to be on your mind that you want answers to. And I'm not going to preside over the world's most extensive discovery request just to accommodate your curiosity here.

So tell me what you - I mean, I'm not going to have the hearing on the merits on the timetable you asked for, because it's not fair to the trustee. And frankly, it's not fair to you to be able to observe it all.

MR. ABRAMS: Yeah. And to, sort of, find common

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1 ground on that timeline, Your Honor, I would say that there are
2 documents that are readily available by the trust and the
3 trustee. I don't see any reason, as an example, why they
4 wouldn't just publish the contract with the lobbyist. So why
5 should that --

6 THE COURT: But Mr. Abrams, what does it solve? What
7 is the purpose of doing so?

8 MR. ABRAMS: You know, my read, Your Honor, of what is
9 required is that we need to evaluate the acts and conduct,
10 right? And so this is not just the quantitative information.
11 This is the qualitative information about what the lobbyist has
12 been doing. I have been engaged in some of these activities
13 and seen firsthand some of the activities and where and how
14 they've engaged and not engaged.

15 THE COURT: But what is the role of the Court? If I
16 order Mr. Molton or the trustee to provide contracts that have
17 existed between the trust and lobbyist, where does that get me?
18 What does it do to advance the cause of the administration of
19 the trust and frankly, to pay the fire victims?

20 MR. ABRAMS: Sure. So --

21 THE COURT: Is there some law violated?

22 MR. ABRAMS: Yeah. So at least, you know, my read of
23 the trust agreement is that those expenses must be reasonable
24 and done in good faith. And given what's transpired around
25 some of these different areas, I think it's right to question

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1 those things. And the amount of information that's been
2 provided would provide no basis for evaluating whether
3 something -- whether these acts have been reasonable or whether
4 these acts have been done in good faith. And, you know,
5 therefore, we need that information to assess. You know, I
6 certainly am not going to guess with zero information about,
7 you know, how this, you know, transpired other than my
8 firsthand experiences. But I think that that's important to
9 come across.

10 And I would say that, you know, the reason why I cited
11 how PwC and Adventist have been treated by the Court is
12 because, you know, certainly, you know, the trust has asked for
13 a number of different documents from PwC, and in response to
14 that, there was no limitation put on them that this is not
15 acceptable. In fact, if anything, it talks about how you can't
16 just say that this is a fishing expedition. It provides broad
17 leeway in terms of --

18 THE COURT: But Mr. Abrams.

19 MR. ABRAMS: And what I --

20 THE COURT: Mr. Abrams. Let's not lose sight of the
21 fact that Adventist is a major creditor claimant, and the
22 trustee has to make sure its claims are proper. And PwC is a
23 potential target of claims against it, and the trustee has to
24 determine whether there is a basis to assert claims against it.

25 You're in neither category. You are a fire victim

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1 claimant, whose, as far as I know, your claim is not in
2 dispute. And I'm not aware of any dispute involving your
3 claim. You simply want to know the details. Who were you
4 paying the lobbyists for and why? Well, that's one of those
5 things like why should I even inquire? If the trustee had the
6 authority to hire the lobbyist, and the lobbyist was paid an
7 amount of money that the oversight committee has signed off on,
8 then, frankly, your inquiry is more of a nuisance than anything
9 else. It not probative.

10 Now, if it turns out the trustee has been siphoning
11 seven figures to an offshore trust, which I doubt that's been
12 the case, I suspect that you have every right to inquire. As
13 do I. But that's not what we're talking about. You simply
14 seem to have taken issue with and focusing specifically on this
15 issue of the lobbyist. And I don't know what I'm supposed to
16 do about it.

17 MR. ABRAMS: So Your Honor --

18 THE COURT: -- do about it?

19 MR. ABRAMS: So Your Honor, what I - I wouldn't say
20 that my -- what I put forward is broad or narrow. I've just
21 put forward a process that has been used by the Court and by
22 the trust in the past to make sure it was manageable. And I am
23 not putting bounds on this. This is not for Will Abrams. This
24 is for victims to be able to --

25 THE COURT: Okay. Okay.

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1 MR. ABRAMS: -- get answers.

2 THE COURT: I'll accept that, Mr. Abrams. I'll accept
3 that. So let's assume that in your mind lobbyist A was paid
4 more than he should have been paid. And for some other reason
5 lobbyist A has been terminated now, and the trust is employing
6 lobbyist B. Well, what would you have me do about whatever was
7 paid to lobbyist A?

8 MR. ABRAMS: So it's less about the number for me,
9 Your Honor. If you're asking my opinion, again, this is not
10 about what I want. But if that were to come back, I would say
11 it's a question of what the acts were of that lobbyist, because
12 what I have observed is that the lobbyists are trying to walk a
13 very fine tightrope in the way that they're lobbying on behalf
14 of victims. They are both trying to get to our 13.5 billion,
15 but they're only trying to do that in a way to make sure that
16 light isn't shined upon other activities.

17 THE COURT: Well, again, Mr. Abrams, that's your
18 theory, and I don't know if you're wrong or right. But again,
19 what is the Court supposed to do if you don't agree with what
20 the trustee has done or what his chosen lobbyist has or hasn't
21 done?

22 MR. ABRAMS: It - it --

23 THE COURT: What's the -- what does -- therefore what,
24 from the bankruptcy court's point of view?

25 MR. ABRAMS: So I think therefore what depends on the

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1 action. So if in that report their actions are not in line
2 with what they should be lobbying form --

3 THE COURT: Who makes that --

4 MR. ABRAMS: And I think that there's --

5 THE COURT: Who makes the decision of what they should
6 be lobbying for? Isn't that the trustee's responsibility,
7 to --

8 MR. ABRAMS: Yes.

9 THE COURT: -- to hire a lobbyists? First of all, we
10 can debate whether he should even hire a lobbyist. But if he
11 has the right to hire lobbyists, and he hires lobbyists, then
12 how am I to second guess on what he chose to have that lobbyist
13 do? He had the authority to hire the lobbyist.

14 Again if he hired the lobbyist to shelter money in a
15 Swiss bank account, that's an easy one. If he hires a lobbyist
16 to go influence a legislative change, how can I second guess
17 him on that?

18 MR. ABRAMS: Look, I think we're all, sort of,
19 guessing at what this is, which is the problem. I think, you
20 know, look, they have fiduciary responsibilities. You would
21 have to look at whether those fiduciary responsibilities --

22 THE COURT: Who has? The lobbyist has fiduciary
23 responsibilities?

24 MR. ABRAMS: The lobbyist and the trust has --

25 THE COURT: Why does the lobbyist have? Why does the

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1 lobbyist have a fiduciary duty?

2 MR. ABRAMS: The trust has fiduciary responsibilities
3 to victims. If the lobbyist is acting on behalf of the trust,
4 then they should be also held to some of those standards. If
5 they are acting in interests that are not in line with victims,
6 then that's a problem. There are, you know, part of this is,
7 you know, it does say that these expenses need to be
8 reasonable. It does need --

9 THE COURT: Well, I don't know - you keep saying that.

10 MR. ABRAMS: -- say that they're in good faith.

11 THE COURT: Sorry. You keep saying that.

12 MR. ABRAMS: If it's not in good faith --

13 THE COURT: Mr. Abrams, you keep saying that. But how
14 am I, ultimately, if I'm supposed to make the call here, how do
15 I make a judgment call on whether Justice Trotter should have
16 hired Mr. A to go visit the legislature to get more money for
17 the Fire Victim Trust rather than do something else that the
18 lobbyist and the trustee thought was consistent with the goals
19 of the trust, but perhaps a different methodology. I don't
20 have the skills or the knowledge, and I doubt that you do, to
21 know the right -- and there's no right or wrong, perhaps, as
22 long as it's lawful and permissible and approved by the
23 advisory committee.

24 MR. ABRAMS: So Your Honor, I know bad faith when I
25 see it, and that's why these provisions are there. I'm sure

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1 that if it's a question people, and it seems like that that is
2 done in bad faith, I'm sure I would make a case to Your Honor
3 that such and such actions were in bad faith. And if others
4 felt that they weren't in bad faith, I'm sure they would argue
5 that point as well. I'm not -- again, this is all guessing
6 based on what might be in that contract, without that contract,
7 without this information.

8 And again, this is sort of going well beyond. I'm
9 setting a process. So that's what I'm doing. So it isn't for
10 any particular piece of information. I want this open to
11 victims to be able to get the information that they want.

12 I have received -- I know Mr. Molton has received lots
13 of questions from victims about how the trust has been
14 administered, why these claims are processed and not those
15 claims. How is this 1.5-billion-dollar loan that they're
16 seeking going to address the shortfall? Lots of questions.

17 THE COURT: But you --

18 MR. ABRAMS: What happened.

19 THE COURT: Mr. Abrams, in the last thirty seconds you
20 covered a very wide range. You've gone from the lobbyists to
21 the 1.5 billion loan that doesn't exist to any particular
22 claimants' determination. Those are three completely different
23 inquiries, and that's what makes your request difficult to
24 manage, because you've asked for so much that I can't imagine
25 anybody could possibly make an intelligent and focused response

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to proper questions.

MR. ABRAMS: So we're - so this is -- so I'm trying.
So help me understand the process, Your Honor, because what
I've seen in the past is first this is approved, as an example,
with PwC. If PwC objects to discovery that's been issued, they
object, and they say, I don't think I should provide that
discovery. But the process was set up first. And it sounds
like we're having a discussion about what's many steps beyond
here, about when the request comes in, is it reasonable and
should be part of the discovery process? And certainly I think
that the trustee should have the right to object to an inquiry
about a particular matter. But we're not there yet. And I
don't think the Court should presuppose that that question is
going to be out of bounds.

I would also say, you know, Mr. Molton, you know,
cited the fact that I've been in the court and had twenty-seven
objections. And I just want to respond briefly, Your Honor.
If you go back and look at those objections that are filed with
the Court and look at the state that we're currently in, I
would say that those objections are very well-founded, Your
Honor. So it's not as if those objections were off base or
somehow inconsistent with what the Court's processes and
procedures were. And if anything, Your Honor, those objections
in the past should only substantiate my filing this motion now
and what this needs to be going forward.

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1 THE COURT: Mr. Abrams, I didn't count, and I didn't
2 criticize you for filing the motion. So you can make your
3 statement. And I'll note it, but I you're talking to the wrong
4 person. I haven't gone back and complained about what has
5 happened in the past.

6 MR. ABRAMS: Right. Mr. Molton brought it up, so I
7 felt compelled to respond, Your Honor.

8 THE COURT: Yes. Okay. That's fair enough. And I
9 understand your point, and I accept your suggestion that we
10 ought to let the trustee and his counsel respond to the
11 process.

12 But you said that you didn't approve of Mr. Molton's
13 suggestion of two weeks to respond. What do you want me to
14 order to do?

15 MR. ABRAMS: What I would like? Again, I'm trying to
16 find middle ground. I want to be able to work with the
17 trustee.

18 THE COURT: Okay. So what do you want me to do? When
19 do you want the response? He offered two weeks. Not two
20 months or two years.

21 MR. ABRAMS: So what I would say, Your Honor, is to
22 grant that two weeks. I would ask that the trustee put on the
23 website the relevant contracts that are for the regulatory
24 engagements, that are for their lobbying engagements. All of
25 the activities where there isn't any proprietary information or

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1 things that are going to affect how they manage our stock
2 should be readily available. It shouldn't be something that's
3 hidden from victims. You know, this is why it's a trust, Your
4 Honor. They should be able to readily produce those documents.
5 And quite frankly, Your Honor, their unwillingness to produce
6 very basic things like that only leads me and others to
7 question more what's in that contract that they are so
8 unwilling to produce it.

9 And again, it's you know, I think this is very
10 important. So I would just ask, Your Honor, that, you know,
11 again, I've been asking well before I filed the motion that if
12 we provide this extension of two weeks, that the trust puts
13 documents that they have readily available on the website, that
14 it has that information, unless it has proprietary information
15 and unless it affects their dealings with the stock.

16 THE COURT: Okay. And so suppose something is filed
17 in two weeks. Are you prepared to respond in some similar
18 fashion?

19 MR. ABRAMS: Well, with my, you know, my deep bench
20 here of staff, I will do my best, Your Honor, as I tried to do
21 in the past.

22 THE COURT: Mr. Abrams, just tell me how much time you
23 would like to anticipate. You have a much better sense than I
24 do of what you're likely to get. And maybe you won't get
25 anywhere near what you expect, but maybe you will, so if I'm

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1 going to take Mr. Molton's offer to respond -- notice, I didn't
2 order and I'm not going to order him what to put out.

3 I said respond, and he might respond with 5,000
4 documents on the website, or he might respond with a fifteen-
5 page brief saying under the law here's why I don't have to
6 produce any of this. And that's something he will have to
7 decide with his client. I'm not going to order it in advance.

8 And I'm trying to go back. And again, I accept your
9 suggestion that we have to let the system play out. And I
10 stand reminded of that, so that's what I'm going to do. But in
11 fairness to him, if he's committing to a two-week response, you
12 have to have some time to respond, but some reasonable time.

13 And I haven't been guilty of refusing further
14 extensions when they're asked for by either side. What if I
15 say you'll have two weeks to respond after that, unless you ask
16 for more time, and if the trustee's counsel agrees to more time
17 from that then you'll get it. I won't stand in your way. That
18 work, or do you want more time to begin with?

19 MR. ABRAMS: Yeah, quite honestly --

20 THE COURT: You want three -- you want four weeks?
21 You want four weeks to respond?

22 MR. ABRAMS: No, to me, Your Honor, really time's of
23 the essence on a lot of these matters.

24 THE COURT: Oh, you've missed --

25 MR. ABRAMS: -- for less time.

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1 THE COURT: Mr. Abrams, you say time is the essence,
2 and I agree with you for people that are trying to get paid.
3 They'd like to get paid sooner rather than later. But I don't
4 sense that anything that we're talking about is going to put
5 one dollar in one fire victim's pocket sooner. I believe it's
6 going to provide information if you have -- if you're right,
7 but I don't know how any particular claimant is going to get
8 one penny sooner rather than later.

9 In fact, it might be the reverse because of the burden
10 on at least some portions of the trustee's staff to deal with
11 this request rather than something else. But I'll assume that
12 there are professionals dealing with lots of things. But how
13 do you think getting this information will speed up the payment
14 process for the fire claimants?

15 MR. ABRAMS: I hope, Your Honor, that this will
16 provide a change in course. I hope, Your Honor, that what
17 this --

18 THE COURT: Well, wait. Say that again.

19 MR. ABRAMS: I hope, Your Honor, that this will
20 provide a change in course to how the trust has been acting,
21 and the way that they've been prioritizing certain things. And
22 I hope that this will put money in victims' pockets sooner.

23 THE COURT: Do you have any reason to believe to
24 support a notion that somehow the trustee is slowing down the
25 payment process?

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1 MR. ABRAMS: Yes, Your Honor. I think that partly
2 what I've been trying to get across to the trust is the fact
3 that their engagement in how they're doing PR, how they're
4 engaging in the regulatory space, how they're engaging in
5 lobbying efforts to try to fund, which the trustee has stated
6 is part of the reason for some of the delays is to try to fund
7 the trust -- has been hampered, has been impeded. And I
8 think --

9 THE COURT: Well, a lot of time (indiscernible) is
10 from my role in this case to have nothing to do with funding
11 the trust other than the payments that were made. In other
12 words, the plan that I approved, the debtor has paid everything
13 in that it was supposed to put in. Now, you can take issue,
14 and I don't disagree with the disappointment that may follow
15 from the stock value, but the company put in everything it was
16 supposed to put in.

17 So if there are others, and I suspect the trustee is
18 one of them, that thought there was an opportunity to get some
19 more value either from expediting third-party claims or
20 prevailing upon the legislative bodies or other sources to put
21 in more money, those are fine and those are good goals. But I
22 don't know how the claims administration is improved by the
23 kinds of things you want the trustee to do now. To me, it's
24 just completely disconnected there.

25 MR. ABRAMS: I'm just trying to again read from the

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1 little information that's been provided by the trustee. The
2 trustee recently stated that if the trust was funded, and we
3 understood what that amount was, that all victims would be paid
4 by the end of the year.

5 THE COURT: But Mr. Abrams --

6 MR. ABRAMS: And Mr. Molton can correct me if I'm
7 wrong but --

8 THE COURT: Mr. Abrams, that -- Mr. Abrams, that has
9 to do with efforts, as I understand it -- again, I don't look
10 at the website. I read what's filed and not a whole lot else.
11 And I don't know what the trustee or other parties are doing to
12 try to supplement the fund from sources that weren't
13 contemplated by the plan.

14 I'll repeat again from my point of view the plan I
15 confirmed had money, cash, value in stock, and third-party
16 claims against vendors and others. Those were the three
17 categories of things.

18 MR. ABRAMS: Right.

19 THE COURT: I don't believe I'm overlooking any big
20 category. And if Justice Trotter or other parties said let's
21 go get some more money by legislative means, and let's
22 facilitate something else, that's a good result for fire
23 claimants. But it's not something that I know what I'm
24 supposed to do.

25 Why don't you tell me that I should tell the trustee

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1 to go buy a lottery ticket because, if he wins the winning
2 lottery ticket, he might get a lot more money for the claimants
3 too. That's ridiculous, of course. But I can't second guess
4 what the trustee believes is the right way to persuade the
5 legislature to put -- to facilitate more cash coming in sooner
6 rather than later.

7 MR. ABRAMS: But the trust agreement says that
8 whatever those expense -- this is our money, the trust's money
9 being spent on these activities. And it says that those
10 expenses need to be reasonable and need to be in good faith.
11 And I have --

12 THE COURT: But sorry, you keep --

13 MR. ABRAMS: Your Honor, if I can.

14 THE COURT: -- repeating that. You keep repeating
15 that, and all I'm asking you again to say is how does that
16 speed up the recovery for a claimant?

17 MR. ABRAMS: Because I believe, Your Honor, that if a
18 expense activity related to those things was shown to be not
19 reasonable that the trust would change course and start doing
20 reasonable things to get to our 13.5 billion, and to pay
21 victims sooner. So I think it is important that we point out
22 what is reasonable and what is not associated with their
23 actions.

24 And as I said, Your Honor, and I'm trying not to argue
25 my case now -- I have first-hand experience in some of these

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1 matters and some of their engagements in terms of lobbying, in
2 terms of regulatory. And I think that I have a case to be
3 made. But it's important that the money that they spend on
4 activities to go fund our trust is reasonable.

5 It shouldn't be a go spend our money on -- and I don't
6 think -- and I hope that this isn't what is shown. But I hope
7 that they are being spent on reasonable things, and it isn't
8 just a wait, here's a great contract for these group of
9 attorneys to go off and make money for the next six months.
10 And I hope that's not the case, Your Honor.

11 I hope when they produce the contracts associated with
12 these engagements that it'll be very clear that these actions
13 are reasonable. But I think that's an important question to
14 ask, particularly because of the recent things that have
15 occurred around lobbying activities because of how they are
16 seeking this 1.5 billion loan without any terms being
17 disclosed.

18 It's important to ask. It's important to ask are
19 these actions reasonable. And if they're not, the trust should
20 change course.

21 THE COURT: Okay. Mr. Molton, I'm not sure how I'm
22 supposed to deal with what Mr. Abrams is trying to accomplish
23 here, but let's stick with your response. And I presume your
24 response will deal with what you think is appropriate, or you
25 and the trustee think is an appropriate way for me to deal with

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1 this request. I'll start with where I -- I'll repeat what I
2 began with.

3 Mr. Abrams made a request. I had some problems with
4 the breadth of it, but not the concept of it. And now we seem
5 to be bogged down on where it gets, and where I kept hearing
6 him say again it seems to come back to his view that there
7 should be a different effort at the lobbying level or a
8 different way to help get some more money in. And that to me
9 is a slightly different inquiry, but are you prepared to deal
10 with those and all of that in the next couple of weeks as
11 you've proposed?

12 MR. MOLTON: Judge, yes. We'd like two weeks to
13 respond. And Mr. Abrams can have what other -- whatever other
14 time he needs to reply and put this on for a convenient date.
15 Needless to say, Judge, we're listening very carefully to this.
16 We've listened very carefully to Mr. Abrams.

17 You heard me say earlier that we're guided by our
18 constitutional documents, which will guide our response, which
19 Your Honor will have in two weeks.

20 THE COURT: Right.

21 MR. MOLTON: So that's how I'd tee it up, Your Honor.

22 THE COURT: Okay. All right. Here's what I'm going
23 to do. I said at the start I would see if anyone wishes to be
24 heard, but I'm not going to turn this into another argument.
25 So I'll just say in advance to anyone else who wants to be

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1 heard you can do a me too, you can say something briefly, but
2 I'm not going to start all over again with the whole argument.

3 Mr. Abrams said it well. Mr. Molton in my mind has
4 said it well from his point of view. So I'm going to take
5 today is June 7th. Two weeks from today is by my count June
6 21.

7 And I'm going to say, Mr. Abrams -- I'm going to give
8 you four weeks to respond after that. And if you respond
9 earlier, that's fine. I'm not going to set a hearing at this
10 point. I'm going to look at that June 21st filing by the
11 trustee, and I'll look at what you file, Mr. Abrams, whether it
12 be four weeks or less than four weeks.

13 And I'll repeat -- and I'll repeat to Mr. Molton. If
14 after this tiering either side needs more time, I'll be
15 accommodating. Again, I'm not making light of the two-and-a-
16 half years or, for the 2015 fire victims, seven victims since
17 some victims haven't been paid. And that's tragic and
18 horrible.

19 And Mr. Abrams, I know the year you suffered your
20 loss, and I know what happened in 2018. And those are all
21 facts that simply are there and haunt all of us. But I'm not
22 going to shortchange the process here for either side. And if
23 the trustee needs more time, he can have it. And if you need
24 more time, Mr. Abrams, you'll have it.

25 When both sides have submitted their papers, I will

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1 review them. And I'll make a decision whether to set a
2 hearing, whether to issue a ruling, what to do. I'm simply not
3 going to lock myself into that at this point.

4 So Mr. Abrams, for some reason you have your hand up,
5 but I've been talking to you, so did you -- do you know why
6 your hand is up?

7 MR. ABRAMS: Sorry, Your Honor. I forgot to hit the
8 button. But --

9 THE COURT: Okay. There is Mr. Lane has his hand up.
10 Ms. Parada, would you bring Mr. Lane in please?

11 Mr. Lane, if you're -- well, you're not coming in yet,
12 I guess. Okay, Mr. Lane, if you'd turn on your camera and your
13 microphone and state your name, I'll let you make a brief
14 statement. Mr. Lane, are you there?

15 MR. LANE: Now, I'm there.

16 THE COURT: All right, just state your name, sir.

17 MR. LANE: Okay, Richard Lane. I'm a Tubbs fire
18 survivor and a claimant in the Fire Victims Trust. I want to
19 thank you, Justice Montali, and you, Mr. Molton for taking your
20 time and listening to Will's motion. I am number 1B on the
21 agenda. I posted that I support Will's request for the
22 hearing.

23 And it's very easy to get lost in the weeds on
24 everything that fire victims are looking for. I myself have a
25 list of seven things that are weed-like. Why don't we know

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1 this? Why don't we get that information.

2 I work a lot with the fire victims in Facebook
3 managing social media of the information that's presented by
4 the trust and spread amongst the fire victims. The group that
5 I belong to has over 5,000 members of 70,000 claimants.

6 The thing that I hear the most is transparency. Why
7 don't we know this, how do we get this, how come we can't get
8 this information? And that is the core, and the crux of Will's
9 motion is we need more information. The greatest fear amongst
10 the claimants in the Fire Victim Trust is that this will drag
11 on.

12 And so when you've got -- when you started discussing,
13 Your Honor, with Will, it was like how do you feel about Mr.
14 Molton's time line for response. And Will said I don't like
15 it. It's too long. And I will tell you on behalf of the
16 claimants in the trust anything that slows this process down
17 just elongates the pain and suffering of this process. So --

18 THE COURT: Okay, Mr. Lane, I got the message. And I
19 told you I'd have a brief statement, and you support Mr.
20 Abrams. And your filing supports his position. And so noted,
21 but you don't get to add seven more things that you haven't put
22 in anything already in the papers.

23 So if Mr. Abrams has his way and gets a portion of
24 what he's looking for, then hopefully you too will be a
25 beneficiary. But for that I'm not going to take any further

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1 argument at this point.

2 MR. LANE: No, I was just bringing up the time line.
3 That's all. The sooner the better.

4 THE COURT: I appreciate your participation.

5 Does anyone else in the court wish to be heard this
6 morning? Raise your hand. All right, I don't see any hands
7 up.

8 Mr. Molton, Mr. Abrams, thank you for your argument.
9 I will look forward to the trustee's filing in two weeks.

10 Mr. Molton, I don't know if you're going to file a 25-
11 page brief or a 2,500-page document. But be ready if I need
12 you to provide hard copies to the courtroom deputy. I'll wait
13 and see what you do when you file. Don't send stuff to me.
14 And one thing I absolutely don't need is copies of the very
15 same things I already have like the trust documents. So be
16 efficient about that.

17 If there is an end -- let me add further, you and your
18 client will decide whether you're going to take Mr. Abrams'
19 request and post things on the fire victims website. If you do
20 that, then do it. And just tell me that you've done it. In
21 other words, a simple addendum to your brief that says the
22 following documents have been posted on the website per Mr.
23 Abrams' request.

24 Now, if the answer is none, I haven't posted any, then
25 you better explain why. If you post some, just have a list.

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1 And I'll look at them like anybody else if I need to. Okay?

2 MR. MOLTON: Appreciate it, Judge.

3 THE COURT: Okay.

4 MR. MOLTON: Good seeing you again.

5 THE COURT: I'm sorry. Did you say anything else, Mr.
6 Molton?

7 MR. MOLTON: I just said it's good to see you again.

8 THE COURT: Okay, thank you.

9 Okay, Mr. Abrams, I appreciate your participation and
10 again, I'll repeat. I'm not counting, and the matter stands
11 submitted. Well, submitted pending the submissions along the
12 time line that I discussed.

13 Thank you for your time. Have a good day, gentlemen.

14 MR. ABRAMS: Thank you, Judge.

15 THE COURT: Court's adjourned.

16 (Whereupon these proceedings were concluded at 10:58 AM)

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I N D E X

RULINGS:	PAGE	LINE
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Objection is Sustained		

C E R T I F I C A T I O N

I, Hana Copperman, certify that the foregoing transcript is a true and accurate record of the proceedings.

Hana Copperman

/s/ HANA COPPERMAN, CET-487

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Date: June 8, 2022

A	24:1;26:3;34:23; 35:12,19	20:23;34:7	15:4;20:24;35:15	began (1) 36:2
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